

# **Modern Slavery Policy**

#### 1 PURPOSE

Modern slavery can take many forms. Fundamentally, modern slavery is a range of exploitive practices including human trafficking, slavery, forced labour and child labour all of which involve the deprivation of a person's liberty by another in order to exploit that person for personal or commercial gain.

This policy sets out Tilt Renewables' commitment to:

- 1.1 Identify, assess and address the risk of modern slavery and, where appropriate, remediation, occurring within its own business, in its supply chains or through any other business relationship.
- 1.2 Comply with all applicable Australian and International slavery legislation including the *Modern Slavery Act 2018* (Cth) and any state-based legislation that may be applicable.

This policy will be used to underpin any statement on modern slavery that is required to be made under that applicable legislation.

#### 2 SCOPE

- 2.1 This policy applies to all persons working for and on behalf of Tilt Renewables in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative (collectively, **Workplace Participants**).
- 2.2 This policy also applies to all persons and entities who have, or seek to have, a business relationship with Tilt Renewables (business partners) and/or who participate in Tilt Renewables' supply chain (suppliers). Tilt Renewables expects these persons and entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

# 3 POLICY

Tilt Renewables is committed to:

- 3.1 A zero-tolerance approach to all forms of modern slavery within its business and within its supply chain.
- 3.2 Acting ethically and with integrity in all its business dealings and relationships.
- 3.3 Implementing and enforcing effective systems and controls to prevent, mitigate and, where appropriate, remediate modern slavery risks and practices in its business and supply chains. This includes:
  - a. communicating this policy to all Workplace Participants, business partners and suppliers;
  - assessing modern slavery and human trafficking risks within Tilt Renewables and its supply chains and developing effective, efficient and transparent controls address those risks;
  - c. including a modern slavery clause into employment and procurement contracts;

<sup>&</sup>lt;sup>1</sup> PARF Company 1 Pty Ltd and PARF Company 2 Pty Ltd (the **Holding Companies**) and the direct and indirect subsidiaries of the Holding Companies trading as Tilt Renewables

Document name: Modern Slavery Policy	Authorised by: Board
Document No: TLT-MS-POL-001	Version: 3
Issue date: September 2025	Review date: September 2027
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- d. implementing appropriate due diligence processes prior to engaging business partners, agents, contractors, consultants, sub-contractors and suppliers;
- e. only engaging entities who demonstrate similar due diligence processes within their own operations and supply chains;
- f. providing training to all Workplace Participants to ensure compliance with this policy and enabling all Workplace Participants to recognise modern slavery risks;
- g. preparing and providing modern slavery statements where required which meet the requirements under section 16 of the *Modern Slavery Act 2018* (Cth) and any state-based legislation; and
- h. implementing continual review mechanisms to enable that Tilt Renewables to remain vigilant to modern slavery risks.
- 3.4 Tilt Renewables expects its business partners and suppliers to:
  - a. ensure they comply with all applicable laws and regulations relating to modern slavery;
  - b. notify Tilt Renewables within 10 business days' of becoming aware of any material risk of modern slavery in their operations or supply chains; and
  - c. have processes in place for their workers to raise concerns, including sharing Tilt Renewables' Whistleblower Policy.

### 4 REPORTING

4.1 Workplace Participants are required to be pro-active and promptly report any suspected violation of this policy. Complaints will be kept confidential and will be dealt with appropriately in line with the Tilt Renewables' Whistleblower Policy found on Tilt Renewables' public website.

# 5 COMMUNICATION AND AWARENESS

5.1 Tilt Renewables will provide biennial training on this policy (and as otherwise necessary) and will communicate the risk of modern slavery in operations and our supply chains.

### **6 BREACHES OF THIS POLICY**

Tilt Renewables considers a breach of this policy to be a serious matter.

- 6.1 Any Workplace Participant who breaches this policy may face disciplinary action in accordance with Tilt Renewables Issue Resolution & Disciplinary Procedure.
- 6.2 Any business partner or supplier who breaches this policy may face suspension or termination. Tilt Renewables may terminate contracts and/or agreements where efforts to remediate a breach are exhausted.
- 6.3 Breaches of this Policy must be reported to the Board.
- 6.4 Where Tilt Renewables identifies, or is made aware of, an actual or suspected modern slavery incident, this may result in a report to the appropriate authorities.

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